## Semitropic Water Storage District

BUTTONWILLOW IMPROVEMENT DISTRICT POND-POSO IMPROVEMENT DISTRICT SEMITROPIC IMPROVEMENT DISTRICT

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June 30, 1998

Lester A. Snow, Executive Director Cal-Fed Bay-Delta Program 1416 Ninth Street, Suite 1155 Sacramento, CA 95814

Attention:

Mr. Rick Breitenbach

Re:

Comments on Draft Programmatic PEIS/R

Dear Ladies and Gentlemen:

These comments are submitted on behalf of Semitropic Water Storage District. Semitropic is located in the central southern San Joaquin Valley, approximately 25 miles northwest of Bakersfield. Its landowners use about 450,000 acre-feet of water, most of which is supplied from the groundwater basin. Semitropic has 155,000 acre-feet of State Water Project entitlement and imports an additional 150,000 acre-feet if and when additional water is available.

We incorporate by reference the comments of Kern County Water Agency, dated June 30, 1998. While we are very supportive of the Cal-Fed process, we wish to emphasize, as delineated in the Agency's comments, that there are many inconsistencies, misconceptions, and what we perceive to be bias in the draft PEIS/R which are not consistent with the actual facts as we know them relative to water usage, alleged environmental problems, and potential solutions.

In particular, we wish to emphasize that there is unrealistic reliance on water conservation and recycling, particularly when compared to the most recent comprehensive review of such matters as set forth in DWR's Bulletin No. 160-98. Furthermore, seemingly absent from the potential mix of measures to protect the environment yet provide sufficient water supplies for the state's cities and farms, is a requirement for good stewardship and conservation of water when used for environmental purposes.

These comments, and the incorporated comments of the Agency, are submitted, in addition to our verbal and written comments provided at the April 29, 1998 hearing in Bakersfield by our Engineer-Manager, Will Boschman, and by our attorney, Ernest Conant.

We understand that Cal-Fed intends to prepare a revised draft Programmatic EIS/R which will identify a draft preferred alternative and which will be available for public review and comment later this year, before the preparation of a Final Programmatic EIS/R. Based on our

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review of the draft now available, it would appear that only Alternative 3 would come close to meeting the water quality and quantity requirements of farms and cities within the State, and at the same time protecting the environment. Accordingly, we recommend the next draft focus on Alternative 3, along with major revisions of the draft, consistent with the referenced Agency comments.

Thank you for your consideration of these views.

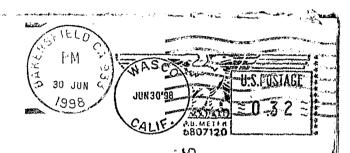
Sincerelyyours

Wilmar L. Boschman Engineer-Manager

WLB:mp

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